

EXHIBIT D

(Hampton Subpoena)

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of Georgia

Coalition for Good Governance and Donna Curling

Plaintiff

v.

Coffee County Board of Elections and Registration

Defendant

Civil Action No. 5:23-mc-00001

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Misty Hampton c/o Jonathan Miller, Esq.

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

Please see attached Exhibits A-D

Place: Oliver Maner LLP
218 West State Street
Savannah, GA 31401

Date and Time: See attached Exhibit A

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 11/08/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party)

Coffee County Board of Elections and Registration, who issues or requests this subpoena, are:

Benjamin M. Perkins, Oliver Maner LLP, 218 West State Street, Savannah GA 31401, bperkins@olivermaner.com
912-236-3311

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

EXHIBIT A

Exhibit A

Responsive Records Due November 17, 2023

1. All documents obtained by the Georgia Bureau of Investigation from Coffee County and Coffee County Board of Elections and Registration transmitted to you or your counsel by the Fulton County District Attorney's office including, without limitation, the electronically stored information on the desktop computer located in the elections office during your employment. (Such files are referenced in the excerpt of the Georgia Bureau of Investigations report at Exhibit B)

Responsive Records Due November 30, 2023

2. All documents (including communications) in your possession or control that evidence, refer to or reflect every email (and related attachments) sent from or received by you using your Coffee County email domain (coffeecounty-ga.gov).
3. All documents (including communications) in your possession or control that evidence, refer to or reflect every email (and related attachments), sent from or received by you using any personal email address, referencing any Coffee County election-related activity, matter or topic between November 1, 2020 and February 25, 2021.
4. All emails and related attachments obtained from the Fulton County District Attorney's office referring to, relating to, or evidencing any Coffee County election-related matter or activity, sent or received from any of the following persons:
 - a. Ed Voyles
 - b. Cathy Latham
 - c. Eric Chaney
 - d. Alex Cruce

The requested files in "a" "b" and "c" are referenced in GBI Report Exhibit 71 (Exhibit C)

The requested files in "d" are referenced in GBI Report Exhibit 72 (Exhibit C)

5. All documents related to Coffee County voter photo ID applications or information stored on the laptop used by you during your employment at the Coffee County Board of Elections and Registration.
6. All documents (including communications) in your possession or control that evidence, refer to, or reflect the ownership, possession or current location of the laptop pictured in the photograph at Exhibit D and used in the course of your employment at the Coffee County Board of Elections and Registration.

EXHIBIT B

**GEORGIA BUREAU OF INVESTIGATION
OFFICE OF SPECIAL INVESTIGATIONS
INVESTIGATIVE SUMMARY**

46-0001-42-23

On Thursday, August 3, 2023, at approximately 1:36 p.m., Special Agent CHRIS BALDWIN received from Special Agent in Charge BRIAN WHIDBY a thumb drive which contained data downloaded from a Desktop PC belonging to the Coffee County Election and Registration Office. The Desktop PC was used by MISTY HAYES, the subject in this computer trespass investigation, at the CCERO in 2021 when the incident occurred. The Desktop PC was previously taken into evidence by Special Agent MICHAEL PEARSON and handed over custody to Digital Forensic Investigator GARRETT MORTON with the GBI Cyber Unit.

During MORTON'S examination of the PC, he discovered there were emails/communications from MISTY HAYES stored on it. MORTON downloaded the data so that SA BALDWIN could review the files for evidentiary value. SA BALDWIN reviewed the data and learned the following information:

The thumb drive consisted of one (1) data folder (41-0046-39-23_CC57146.E01). The folder contained 616,678 files. Most notably, those files included 213,092 iOS (Apple) iMessages, 1,470 iOS call logs, 1,999 Apple contacts, 5,609 social networking files (Instagram, Tinder, Life360, and Pinterest), 4,552 documents, and 10,477 Outlook emails.

The iOS iMessages, call logs, contacts, and social networking files appeared to have been downloaded to the PC when it was connected to the iPhone on June 25, 2019. That would have been 1.5 years prior to the incident being investigated.

46-0001-42-23

Of the 4,552 documents, 1,986 were created between November 1, 2020 and March 1, 2021. SA BALDWIN discovered one (1) Microsoft Word Document filename "BOARD%20MINUTES%20-%20January%2012((Autorecovered-308699603345371840)).asd", listed as "Record 1" under the Microsoft Word Documents sub-header on the Axiom Report. The document was the Coffee County Board of Elections and Registration Monthly Board Meeting Minutes for February 2, 2021. SA BALDWIN had previously seen the February agenda document, but not the actual minutes from the meeting. A copy of that Word Document has been attached to this summary.

Of the 10,477 Outlook emails, 3,029 were created between November 1, 2020 and March 1, 2021. Of those 3,029 emails, 3,010 were associated with the email account misty.Hampton@coffeecounty-ga.gov.ost. The other 19 emails were associated with the email account misty.hayes0405@icloud.com.ost. It should be noted that ".ost" is the extension for a Microsoft Outlook data file. The emails primarily consisted of HAYES working on Open Records Requests or conducting elections.

SA BALDWIN found seven (7) emails of particular interest. Those emails were listed as "Record 1" through "Record 7" under the Outlook Emails sub-header on the Axiom Report. Below is a description of the seven (7) Outlook Email Records (in chronological order):

Record 1

Email from PRESTON HALIBURTON ([REDACTED]) to MISTY HAMPTON "HAYES" (misty.hampton@coffeecounty-ga.gov) on December 31, 2020 at approximately 8:19 p.m. Attached was an Open Records Request Word Document

46-0001-42-23

titled "FILE_8668.docx" ("Record 1" under the Email Attachments sub-header on the Axiom Report). A copy of that Word Document has been attached to this summary.

Record 5

Email from HAYES to HALIBURTON, and CC'd ERNESTINE THOMAS-CLARK ([REDACTED]) on December 31, 2020 at approximately 10:20 p.m. HAYES informed HALIBURTON of the receipt of his ORR. In the email, HAYES stated "Y'all are welcome in our office anytime. Coffee County is willing to work with anyone with accordance to the Georgia law". That email occurred one (1) week prior to the initial computer trespass incident.

Record 2/3

Record 3 was where HAYES forwarded her original response to the HALIBURTON ORR to another HALIBURTON email ([REDACTED]) on January 1, 2021 at approximately 12:51 a.m. Record 2 was an email from Microsoft to HAYES advising her that the email address "[REDACTED]" did not exist.

Record 6

Email from HAYES to a third HALIBURTON email ([REDACTED]) on January 1, 2021 at approximately 2:05 a.m. Attached to the email was a Word Document with an official response to HALIBURTON'S ORR on Coffee County Government letterhead. In that email, HAYES included her personal phone number (912-850-4823) whereas the previous communications only included her work phone numbers. The attached Word Document was titled "Letter NOT Certifying Recount.docx" and has been attached to this summary.

46-0001-42-23

Record 7

Email from HAYES to ERIC CHANEY () and ED VOYLES () on January 2, 2021 at 1:21 a.m. The email was a forward of an original email from DAVID GREENWALT, Southeast Election Director of KNOWINK. KNOWINK has developed election poll pads and election management software. In the email, GREENWALT was addressing the "patently false assertions" that there was "unauthorized access to our systems". SA BALDWIN found this to be particularly notable due to the fact that HAYES, CHANEY, and VOYLES would be present at the CCERO five (5) days later while third-parties accessed those same machines.

Record 4

Email from WESLEY VICKERS, Coffee County Manager, to HAYES, THOMAS-CLARK (), and WENDELL STONE () on January 4, 2021 at 8:31 p.m. The email stated that the board of commissioners "appointed WENDELL (STONE) and MATTHEW(MCCULLOUGH) to the board this morning. They also appointed ANDY THOMAS to take MR. PEAVY'S spot". This confirmed what C.T. PEAVY had told SA BALDWIN during their interview, that PEAVY was no longer on the Board of Elections when the computer trespass incident occurred.

A copy of the Magnet Axiom Report has been attached to this summary.

Investigative act concluded.

ATTACHMENTS

COPY OF NOTE(S) CCBOE 2/2/2021 Meeting
Minutes

[\(Attachments\)](#)

OTHER Magnet Axiom Reports

[\(Attachments\)](#)

E-MAIL(S) Attachments

[\(Attachments\)](#)

EVIDENCE

DELL OPTIPLEX 3060 MICRO DESKTOP COMPUTER;

[CC57146-8E2D52A9-Evidence.pdf](#)

THUMB DRIVE CONTAINING DATA FROM COFFEE COUNTY

[BB61195-Evidence.pdf](#)

SPECIAL AGENT CHRISTOPHER BALDWIN: 8/4/2023

cb: 8/4/2023



EXHIBIT C

**GEORGIA BUREAU OF INVESTIGATION
OFFICE OF SPECIAL INVESTIGATIONS
INVESTIGATIVE SUMMARY**

46-0001-42-23

On Monday, December 12, 2022, at approximately 10:00 a.m., SAC WHIDBY received from Google, documents responsive to a search warrant for Google email accounts [REDACTED] (ED VOYLES), [REDACTED] (CATHY LATHAM), & [REDACTED] (ERIC CHANEY) for the time period of November 1, 2020 to March 1, 2021. The documents were processed to a readable format on Magnet Axiom by GBI Digital Forensic Investigator (DFI) MEGAN ENGLAND. A copy of that thumb drive was given to Special Agent CHRIS BALDWIN. It should be noted that the three (3) Google accounts were combined when processing via Magnet Axiom. SA BALDWIN was tasked with reviewing the files for evidentiary value related to the January 7th, 2021 computer trespass incident at the Coffee County Elections and Registration Office in Douglas, Coffee County, Georgia. SA BALDWIN reviewed the production and learned the following information:

The production consisted of one (1) zip file (F:\26856453-20221209-1.zip). The zip file contained 56,721 files. Those files included 5,835 identifiers, 45,688 emails, 5,015 email attachments, 182 text documents, and one (1) miscellaneous file. The 5,835 identifiers were unique instances of contacts found throughout the production. The 182 text documents were Google generated reports overviewing the Google accounts. The one (1) miscellaneous file appeared to be file system information. It should be noted that the production produced by Google included preserved records as well as a copy of current records. The Magnet Axiom program included both sets of records when processing. Therefore, the amount of files were largely duplicated. The numbers documented below will only include the preserved records.

46-0001-42-23

██████████ accounted for 5,408 of the emails and 411 of the email attachments. Of those emails, 1,764 emails occurred between January 1, 2021 and January 31, 2021. During the month of January 2021, VOYLES communicated via email with:

MARILYN MARKS nine (9) times

CATHY LATHAM one (1) time

MISTY HAYES one (1) time

Group email with MARKS and HAYES (VOYLES was CC'd) one (1) time

Group email with MARKS and LATHAM one (1) time

Group email with HAYES and ERIC CHANEY two (2) times

None of the above detailed 15 emails had any evidentiary value as it pertained to the computer trespass incident that occurred at the Coffee County Elections and Registration Office in January 2021. The emails were largely concerning Open Records Requests made to Coffee County or the dissemination of articles/memorandums that detailed fraud/voting machine vulnerabilities during the 2020 Presidential Election.

██████████ accounted for 4,162 of the emails and 513 of the email attachments. Of those emails, 924 emails occurred between January 1, 2021 and January 31, 2021. During the month of January 2021, CHANEY communicated via email with:

HAYES three (3) times

LATHAM two (2) times

PRESTON HALIBURTON two (2) times

Group email with HAYES and DENNIS CARBONE (CHANEY and ERNESTINE THOMAS-CLARK were CC'd) one (1) time

46-0001-42-23

Group email with HAYES and VOYLES two (2) times

Group email with LATHAM and SHARON MANSELL one (1) time

None of the above detailed 11 emails had any evidentiary value as it pertained to the computer trespass incident that occurred at the CCERO in January 2021. The emails between CHANEY, LATHAM, and HALIBURTON were about filing a lawsuit against Georgia SoS and Dominion. The email with MANSELL was about completing an affidavit for the LIN WOOD FightBack.Law group reference election irregularities.

██████████ accounted for 22,139 of the emails and 2,549 of the email attachments. It should be noted, the LATHAM account records appeared to have been preserved multiple times, as there were up to five (5) copies of the same email most times. Due to that fact, the records labeled as "Preserved_001" in the source code were used for consistency. Once refined, there were 4,409 emails in total. Of those emails, 1,001 emails occurred between January 1, 2021 and January 31, 2021. During the month of January 2021, LATHAM communicated via email with:

HALIBURTON three (3) times

CHANEY two (2) times

HAYES one (1) time

VOYLES one (1) time

Group email with HALIBURTON and KATIE CAGLE one (1) time

Group email with MANSELL and CHANEY one (1) time

None of the above detailed nine (9) emails had any evidentiary value as it pertained to the computer trespass incident that occurred at the CCERO in January 2021. The emails involving CHANEY pertain to the lawsuit LATHAM was filing against the GA SoS. The emails with HALIBURTON discuss contacts for Georgia county election supervisors.

46-0001-42-23

SA BALDWIN then ran some keywords through the 13,979 unique emails detailed above for all three (3) batches of records. Some of those keywords were "Copy" (5,318 emails), "Coffee County" (320 emails), "Dominion" (311 emails), "Voting Machines" (126 emails), and "Forensic" (74 emails). Below are emails of note that were discovered utilizing keywords:

Email communications between CHANEY and ROBERT SINNERS

██████████ on November 11 and 12, 2020, detail CHANEY'S desire to report the issues he has found with the vulnerability of Dominion Voting Machines and Software.

Email communication between VOYLES and WOOD ██████████ on November 17, 2020, detail VOYLES disseminating a letter written by the Coffee County Board of Elections about the "deficiencies in the current Dominion election system". The letter was sent from the CCBOE to SoS BRAD RAFFENSPERGER.

In total, 38 emails of interest were discovered. That Axiom Magnet Report has been attached to this summary.

Investigative act concluded.

ATTACHMENTS

DIGITAL ANALYSIS/PREVIEW LAB NOTES (Attachments)
Axiom Magnet Rprt of 3 Gmail Records

DIGITAL ANALYSIS/PREVIEW LAB NOTES (Attachments)
Axiom Magnet Rprt Attachments

EVIDENCE

GOOGLE RESPONSIVE DOCUMENTS FROM SW FOR [CC57154-Evidence.pdf](#)

ID DATA:

CHANEY, ERIC BRANDON

[illegible]

LATHAM, CATHLEEN

[REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

VOYLES, BLAKE EDWARD

[REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

SPECIAL AGENT CHRISTOPHER BALDWIN: 7/17/2023
cb: 7/17/2023

22

**GEORGIA BUREAU OF INVESTIGATION
OFFICE OF SPECIAL INVESTIGATIONS
INVESTIGATIVE SUMMARY**

46-0001-42-23

On Monday, January 30, 2023, at approximately 11:36 a.m., Special Agent CHRIS BALDWIN received an email from Google, LLC. reference email records for account [REDACTED] from November 1, 2020 to March 1, 2021. The account belonged to the subject in this computer trespass investigation, ALEX CRUCE. The email contained production for a previously submitted search warrant. The records were downloaded into the OSI Data Drive.

SA BALDWIN had difficulty accessing the production due to the size. SA BALDWIN contacted GBI CEACC Digital Forensic Investigator MEGAN ENGLAND for assistance with accessing the records. DFI ENGLAND was able to transport the Google records into a program called Magnet Axiom. SA BALDWIN reviewed the production and learned the following information:

The production consisted of two (2) zip files (K:Google SW

Results - [REDACTED]
[REDACTED]

[REDACTED]. SA BALDWIN believed that the inclusion of the second zip file was a mistake by Google, due to the fact that the same file was included in the first zip file. Between the zip files, there were 14,961 emails, 2,217 email attachments, 31 text documents, and four (4) miscellaneous files that were transmitted to/from the Google account between November 1, 2020 and March 1, 2021. The 31 text documents were Google generated reports overviewing the Google account. The four (4) miscellaneous files appeared to be file system information. Among the miscellaneous files was item ID #19298. This file contained a recovery email [REDACTED] and

46-0001-42-23

recovery phone number [REDACTED] for the Google account. It should be noted that the production produced by Google included preserved records as well as a copy of current records. The Magnet Axiom program included both sets of records when processing. Therefore, the amount of files were largely duplicated. The numbers documented below will only include unique communications.

CRUCE communicated most frequently with JACK MAGAN [REDACTED] and ELIZABETH MAZZIO [REDACTED] about their research into voter records for the 2020 United States Presidential Election. MAGAN would refer to the them as "TEAM MAGAn". It appeared to SA BALDWIN, that "TEAM MAGAn" was solely focused on discovering evidence of voter fraud during the 2020 Presidential Election. MAGAN nor MAZZIO had any connections to the computer trespass incidents at the Coffee County Elections and Registration Office in January, 2021. Other CRUCE contacts of interest were documented below.

SCOTT HALL [REDACTED] - 43 emails
Two (2) emails were sent from this account to CRUCE.
Seven (7) emails were sent from CRUCE to this account.

HALL [REDACTED] - 93 emails
27 emails were sent from this account to CRUCE.
66 emails were sent from CRUCE to this account.

HALL [REDACTED] - four (4) emails
Three (3) emails were sent from this account to CRUCE.

46-0001-42-23

One (1) email was sent from CRUCE to this account.

All 140 emails between HALL and CRUCE pertain to efforts to assist one another in the analyzation of the 2020 Presidential Election results.

MISTY HAYES [REDACTED] - two (2) emails

Two (2) emails were sent from CRUCE to HAYES. The emails contained an excel spreadsheet which CRUCE was requesting HAYES complete by inserting voter history data. This email had previously been discussed during the interview with CRUCE (Summary ID #917427).

HAYES [REDACTED] - one (1) email

One (1) email was sent from this account to CRUCE. The email contained the completed excel spreadsheet previously sent to HAYES from CRUCE.

PAUL MAGGIO [REDACTED]

No emails were sent directly between CRUCE and MAGGIO; however, there were 14 emails in which both were CC'd together on emails. Those emails were all associated with mass emails sent by GARLAND FAVORITO. FAVORITO was a well known critic of the Georgia Digital Election Systems.

GREG FREEMYER [REDACTED]

No emails were sent directly between CRUCE and FREEMYER; however, there were

46-0001-42-23

14 emails in which both were CC'd together on emails. Those emails were all associated with mass emails sent by FAVORITO.

DOUG LOGAN [REDACTED]

No emails were sent directly between CRUCE and LOGAN; however, there were 36 emails in which both were CC'd together on emails. Some of those emails were associated with mass emails sent by FAVORITO. The others were emails sent from MAGAN, MAZZIO, CARISSA KESHEL [REDACTED] SHARON MANSELL [REDACTED] during January, 2021, in reference to their efforts in the analyzation of the 2020 Presidential Election results.

JIM PENROSE [REDACTED]

No emails were sent directly between CRUCE and PENROSE; however, there were four (4) emails in which both were CC'd together on emails. The emails were sent from MAZZIO and MANSELL during January, 2021, in reference to their efforts in the analyzation of the 2020 Presidential Election results.

LIN WOOD [REDACTED]

No emails were sent directly between CRUCE and WOOD. There were 12 emails that were sent from MAGAN, MAZZIO, MANSELL and KESHEL during January, 2021, in reference to their efforts in the analyzation of the 2020 Presidential Election results.

46-0001-42-23

SIDNEY POWELL [REDACTED]

No emails were sent directly between CRUCE and POWELL; however, there were six (6) emails in which both were sent an email from the same sender. Senders included MAGAN, FAVORITO, and KESHEL. The emails from MAGAN were providing updates about Team MAGAN to POWELL. The other emails were about Dominion election systems.

PRESTON HALIBURTON

[REDACTED]

No emails were sent directly between CRUCE and HALIBURTON. There were 12 emails in which HALIBURTON was CC'd in from FAVORITO. All 12 emails were in reference to FAVORITO mass emails with a subject line of "Election Anomalies Mean GA Legislature Must Forensically Inspect Ballots and Voting Systems".

BOB CHEELEY [REDACTED]

No emails were sent directly between CRUCE and CHEELEY. There were 14 emails in which CHEELEY was CC'd by FAVORITO. Twelve of the 14 emails were in reference to FAVORITO mass emails with a subject line of "Election Anomalies Mean GA Legislature Must Forensically Inspect Ballots and Voting Systems". Two (2) additional emails were sent to CHEELEY by FAVORITO with different subject lines; however, the intent of the emails were the same.

CHARLES BUNDREN [REDACTED]

46-0001-42-23

No emails were sent directly between CRUCE and BUNDREN. There were 13 emails in which BUNDREN was CC'd by FAVORITO. Twelve of the 13 emails were in reference to FAVORITO mass emails with a subject line of "Election Anomalies Mean GA Legislature Must Forensically Inspect Ballots and Voting Systems". One (1) additional email was sent to BUNDREN by FAVORITO with different subject lines; however, the intent of the emails were the same.

Of the emails listed above, none contained information in reference to the computer trespass incident that occurred at the CCERO in January, 2021. Most emails consisted of communications regarding the analyzation of the 2020 Presidential Election.

Of the 138 emails and 78 email attachments that contained the term "coffee", none of them were in reference to the computer trespass incident that occurred at the CCERO.

A copy of the search warrant production and three (3) reports of relevant emails, email attachments, and email identifiers have been attached to this summary.

Investigative act concluded.

ATTACHMENTS

| | |
|--|-------------------------------|
| OTHER Google Records | (Attachments) |
| OTHER DFI Processed Records - Emails Report | (Attachments) |
| OTHER DFI Processed Records - Email Attachments Report | (Attachments) |
| OTHER DFI Processed Records - Identifiers Report | (Attachments) |

EVIDENCE

THUMB DRIVE CONTAINING MAGNET AXIOM REPORT FOR [CC57003-Evidence.pdf](#)

ID DATA:

CRUCE, ALEX A (DOCTOR)

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

SPECIAL AGENT CHRISTOPHER BALDWIN: 2/1/2023

cb: 2/1/2023

BW

EXHIBIT D

AXIS M3045-V Network Camera (10.20.62.51) - Camera 1

Playback

< Select view >    Link window Verify Signatures...

AXIS M3045-V Network Camera (10.20.62.51) - Camera 1 - 2/22/2021 3:42:20.240 PM



10:00 AM 11:00 AM 12:00 PM 1:00 PM 2:00 PM 3:00 2/22/2021 3:42:20.513 PM 5:00 PM 6:00 PM 7:00 PM 8:00 PM 9:00 PM

AXIS M3045-V Network Camera (10.20.62.51) - Camera 1

All cameras in view

1x  1/2x

12 hours

Export